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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS  
MOLINA, JHONY SILVA, MARIA ELENA  
HERNANDEZ, O.C., SANDHYA LAMA,  
S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**PLAINTIFFS' NOTICE OF ERRATA AND  
CORRECTED DECLARATION OF  
JESSICA KARP BANSAL IN SUPPORT OF  
PLAINTIFFS' MOTION TO POSTPONE  
EFFECTIVE DATE OF AGENCY ACTION**

**(Replaces Dkt. 18 and Dkt. 18-16)**

Assigned to: Hon. Trina L Thompson

Date: TBD  
Time: TBD  
Place: TBD

Complaint Filed: July 7, 2025

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PLEASE TAKE NOTICE that Plaintiffs hereby respectfully attach as Exhibit A the Corrected Declaration of Jessica Karp Bansal in Support of Plaintiffs' Motion to Postpone Effective Date of Agency Action (replaces Dkt. 18), correcting Exhibit 16 [Dkt. 18-16] which now includes the correct social media post of Secretary Kristi Noem and transcript of the January 29, 2025, CNN video interview with Kristi Noem included in the social media post.

Date: July 12, 2025

Respectfully submitted,

NATIONAL DAY LABORER  
ORGANIZING NETWORK

/s/ Jessica Karp Bansal

Jessica Karp Bansal

Lauren Michel Wilfong (*Pro Hac Vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

NATIONAL DAY LABORER  
ORGANIZING NETWORK

/s/ Jessica Karp Bansal

Jessica Karp Bansal

Lauren Michel Wilfong (*Pro Hac Vice*)